

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

This Document Relates To:

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 1:21-cv-7001 (PKC)

**CLIFFY CARE LANDSCAPING LLC RESPONSES AND OBJECTIONS TO
DEFENDANTS' RULE 36(a)(1)(A) REQUESTS FOR ADMISSION**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, and the Civil Local Rules of the United States District Court of the Southern District of New York, Plaintiff Clifffy Care Landscaping LLC (“Plaintiff”) submits the following objections and responses to the First Set of Requests for Admission (“Requests”) by Defendants Google LLC and Alphabet Inc. (collectively “Defendants”) as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. The following responses and objections are based on the facts and information presently known and available to Plaintiff and are given without prejudice to Plaintiff’s right to amend, modify, or supplement the objections or responses stated herein. No incidental or implied admissions are intended in or by any of these responses. That Plaintiff has responded to all or

Request for Admission No. 3:

On November 20, 2019, Clifly Landscaping declined to Opt Out of the Dispute Resolution Agreement and has never subsequently Opted Out of the Dispute Resolution Agreement.

Response to Request for Admission No. 3:

Plaintiff objects to the phrase “declined” as vague and ambiguous and subject to multiple interpretations. Plaintiff further objects on the grounds that the Request calls for a legal conclusion. Plaintiff objects that the Request is compound.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Plaintiff admits that it did not take affirmative action to opt out of the dispute resolution agreement presented in the 2019 terms and conditions. Plaintiff denies anything else implied by the request, including but not limited, that a valid right to opt out was ever presented to Plaintiff.

Dated: October 14, 2024

/s/ Mikaela M. Bock

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